BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes, 2001

Docket No. R2001-1

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

NEWSPAPER ASSOCIATION OF AMERICA SECOND SET OF INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS LESLIE SCHENK (NAA/USPS-T43-10) November 16, 2001

The Newspaper Association of America hereby submits the attached interrogatory to United States Postal Service witness Leslie Schenk (USPS-T-43) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

November 16, 2001

William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA SECOND SET OF INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS LESLIE SCHENK (NAA/USPS-T43-10)

NAA/USPS-T43-10: Please refer to the "TY Summary" page of LR-J-117.xls.

- a. For the ECR volumes, you cite LR-J-52. Please identify the location of these data in LR-J-52, or the correct citation, if not there.
- b. Please confirm that your ECR figures include NECR.
- c. Please confirm that the volumes and costs are TYBR figures.
- d. Please confirm that, after receiving the TY volumes and total TY costs for ECR from witnesses Smith and Patelunas, you performed all the calculations to determine the costs by density tier for ECR mail.